

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:	November 19, 2018
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	60 days after Initial Conference, January 4, 2019; parties are only in partial agreement as to scope of Phase 1 discovery, which can be resolved once Defendant's forthcoming motion to stay is resolved
Date for initial settlement conference: <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	2/1/2019

Phase II (Discovery and Motion Practice)*

*Defendants intend to seek a stay to phase II discovery period which, if granted, would delay these deadlines. Plaintiffs intend to oppose any such motion.

Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference)</i>	March 15, 2019
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	January 21, 2019
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	May 21, 2019
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	Initial: June 20, 2019 Rebuttal: July 20, 2019
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	August 19, 2019
COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference)</i>	August 19, 2019
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	October 18, 2019 (Per Judge Korman's rules, the parties will meet-and-confer before this deadline to propose a briefing schedule for any dispositive motions and/or motions in limine)
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	No